

EXHIBIT 4

**REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

vs.

Case No. 17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO
TRUCKING LLC,

Defendants.

VIDEO DEPOSITION OF EMIL MICHAEL

San Francisco, California

Friday, July 28, 2017

Volume I

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546

JOB NO. 2666869

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1 efforts in the long run concerning autonomous
2 vehicles?

3 MS. RAY: Objection. Form.

4 THE DEPONENT: I don't know exactly if it
5 was going to save us money. It was more about
6 time.

7 Q. (By Mr. Perlson) When Uber was
8 considering acquiring Otto, did Uber come up with
9 an internal valuation of Otto?

10 A. I don't recall that we did.

02:24:37

11 Q. Describe the state of Uber's autonomous
12 vehicle technology when you left Uber.

13 MS. RAY: Objection. Form.

14 THE DEPONENT: I just -- I am not a
15 technologist, so I don't know. I just know that

02:25:05

16 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] but that's

20 sort of much as all I had knowledge about.

02:25:32

21 Q. (By Mr. Perlson) Do you know whether --
22 how far away Uber was for -- from a commercial
23 launch when you left Uber?

24 MS. RAY: Objection. Form.

25 THE DEPONENT: [REDACTED]

02:25:45

1

[REDACTED]

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

[REDACTED]

9

MS. RAY: Objection. Form.

10

THE DEPONENT: No idea.

02:26:24

11

Q. (By Mr. Perlson) When -- when you left

12

Uber, did you have any idea of how many LiDAR units

13

Uber was planning to manufacture this year?

14

MS. RAY: Objection. Form.

15

THE DEPONENT: No.

02:26:43

16

Q. (By Mr. Perlson) Does Waymo have a

17

technological lead with respect to autonomous

18

vehicle development?

19

MS. RAY: Objection. Form.

20

THE DEPONENT: Yes, it is my belief.

02:26:58

21

Q. (By Mr. Perlson) Has acquiring Otto

22

changed Uber's estimate of Waymo's lead?

23

MS. RAY: Objection. Form.

24

THE DEPONENT: Not as far as I know.

25

Q. (By Mr. Perlson) Do you agree that the

02:27:16

1 I, Rebecca L. Romano, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath;
8 that a record of the proceedings was made by me
9 using machine shorthand which was thereafter
10 transcribed under my direction; that the foregoing
11 transcript is true record of the testimony given.

12 Further, that if the foregoing pertains to the
13 original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [X] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21
22 Dated: July 29, 2017

23 
24

25
Rebecca L. Romano, RPR,
CSR. No 12546